

STORAGE ROOM OCCUPANCY SEPARATION

IR 3-1

Reference: 2001 California Building Code (Title 24, Part2), Sections 302, 504.3, and Table 3-B.

Revised 09-18-07
Issued 02-20-07

Discipline: Fire and Life Safety

This Interpretation of Regulation (IR) is intended for use by the Division of the State Architect (DSA) staff, and as a resource for design professionals, to promote more uniform statewide criteria for plan review and construction inspection of projects within the jurisdiction of DSA, which include State of California public elementary and secondary schools (grades K-12), community colleges, and state-owned or state-leased essential services buildings. This IR indicates an acceptable method for achieving compliance with applicable codes and regulations, although other methods proposed by design professionals may be considered by DSA.

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Purpose: The purpose of this IR is to clarify the 2001 CBC requirements, and provide guidance for storage room occupancy separations. (In the 2007 CBC this issue is addressed in Table 508.2.)

Background: The 2001 California Building Code is not specifically clear in excluding small areas that do not pose a significant hazard from the need of an occupancy separation in a number of cases.

2001 CBC Section 302.4 requires occupancy separations "Be provided between the various Groups and Divisions ... as set forth in Table 3-B." Certain exceptions apply. The occupancy separations are based on the real and potential hazards associated with each.

2001 CBC Section 504.3 addresses the "Allowable Floor Area of Mixed Occupancies" and does not address the separation of occupancies, therefore the exceptions listed do not apply to occupancy separations. This is a common misconception by design professionals and plan reviewers alike.

DSA recognizes that hazardous materials in quantities less than those listed in 2001 CBC, Table 3-D are able to be stored in smaller spaces and not present a high risk to the building. The hazards presented by materials in small storage rooms are significantly curtailed due to the reduced quantities of materials physically able to be stored.

Interpretation: If a Storage Area (S-1 & S-2) is found within or adjoining the following occupancies: E, A-1, A-2, or A2.1, and the Storage Area is 100 square feet or more in size, then the storage area is required to have the occupancy separation required in 2001 CBC Table 3-B. If the area is 99 square feet or less, then it will be considered an accessory closet and the occupancy separation will not be required.

Storage Areas or closets designated for storage of materials in quantities in excess of those listed in 2001 CBC, Table 3-D will be classified as the appropriate "H" Occupancy, and will be required to have the appropriate Occupancy Separations regardless of size, per 2001 CBC, Table 3-B.

Mechanical and Electrical rooms are not required to have a one-hour occupancy separation except as noted in 2001 CBC, Section 302.5.